

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,
Plaintiffs,

v.

THE STATE OF TEXAS, *et al.*,
Defendants.

§
§
§
§
§
§
§

Case No. 5:21-cv-844-XR
[Lead Case]

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,
Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,
Defendants.

§
§
§
§
§
§
§

Case No. 5:21-cv-844-XR
[Lead Case]

DECLARATION OF RUTH R. HUGHS

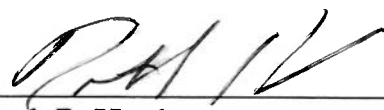
I, Ruth R. Hughs, hereby declare as follows:

1. I am over the age of eighteen years and am in all respects competent to make this affidavit.
2. I served as the 113th Texas Secretary of State from August 19, 2019 until May 31, 2021. I make this declaration in support of the Motion for a Protective Order in the *La Unión del Pueblo Entero v. State of Texas* matter, a lawsuit I understand is currently pending in the United States District Court for the Western District of Texas, San Antonio Division.
3. At the time I left office as Texas Secretary of State, the Office of the Texas Secretary of State employed approximately 180 employees across multiple divisions.
4. Having reviewed Mi Familia Vota's operative complaint, I understand which provisions of Senate Bill 1 (SB1) Mi Familia Vota is challenging in this lawsuit.
5. I also have no unique or superior personal knowledge of facts related to the passage of the provisions of SB1 that are the subject of this lawsuit. Any knowledge I have regarding the passage of the challenged provisions of SB1 was relayed to me via Office of the Secretary of State personnel, and thus my knowledge of this matter is neither unique nor superior to other employees of the Office of the Secretary of State with more familiarity with the issues.

6. I have no direct personal knowledge of facts related to the implementation of the provisions of SB1 that are the subject of this lawsuit. Implementation of SB1 did not begin during my tenure as the Texas Secretary of State. Furthermore, based on my review of the operative complaint, the challenged provisions of SB1 are implemented at the local level. Even if I had still been serving as the Texas Secretary of State, any personal knowledge I could have had regarding the implementation of the challenged provisions of SB1 would have been relayed to me via Office of the Secretary of State personnel, and thus my knowledge of this matter would have been neither unique nor superior to other employees of the Office of the Secretary of State with more familiarity with the issues.
7. Further, I have no direct personal knowledge of purported motivations of individual members of the Texas Legislature for enacting SB1 that are the subject of this lawsuit.
8. As of the date of my resignation as Texas Secretary of State, the Office of the Texas Secretary of State was involved in numerous lawsuits in both federal and state courts.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed in Travis County, Texas, on April 6, 2022.



Ruth R. Hughs
113th Texas Secretary of State